

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

2006 MAR 14 A 9:19

DEBRA P. HAYETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

L.D. Brock, # 235552

Full name and prison number  
of plaintiff(s)

v.

CIVIL ACTION NO. 2:06cv235-WHA  
(To be supplied by Clerk of  
U.S. District Court)

Gwendolyn C. Mosley is III

Thomas Bailey, Co I

Munchie Keaton Co I

Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ( ) NO (X)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ( ) NO (X)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT EASTERLING CORRECTIONAL  
CENTER, 200 WALLACE DR, CLIO, ALABAMA 36017

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED \_\_\_\_\_  
EASTERLING

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. GWENDOLYN MOSLEY 200 WALLACE DR. CLIO, AL 36017
2. THOMAS BAILEY COI, 200 WALLACE DR, CLIO, AL 36017
3. MUNCHIE KEATON COI, 200 WALLACE DR, CLIO, AL 36017
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED \_\_\_\_\_  
FEB, 21, 2006

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: CAUSED BODYLY HARM, BY OVER ABUSEING  
THEIR POWER.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

ON FEB, 21, 2006, AT KITCHEN OFFICER THOMAS BAILEY MADE PETITIONER TAKE A BARE RAZOR BLADE AND SHADE ~~WITH~~ WITH IT WITHOUT CREAM, PETITIONER STATED HE DIDN'T HAVE A STAFF, THEY DON'T HAVE ANY IN THE CUBE, OFFICER BAILEY STATED I DON'T CARE YOUR WHITE ASS IS GOING TO SHADE, PETITIONER WAS CUTTING HIS-

GROUND TWO: DISCRIMINATING AGAINST ME, IN A IMPROPER MANNER FOR CORRECTIONS OFFICER

SUPPORTING FACTS: WHEN PETITIONER WENT BACK TO THE DORM, HE TRIED TO GET OFFICER KEATON TO LET HIM GO TO HCU, BECAUSE OF THE CUTS HE WOULD NOT DO IT, PETITIONER TRIED TO GO TO THE SHIFT COMMANDERS OFFICE THEY WOULD NOT LET HIM, HE WAS REFUSED TREATMENT FOR THIS, PLUS THE CORRECTIONS AT EASTERLING IS EMPLOYED WITH WITH 85% BLACK, 15% WHITE - Cont

GROUND THREE:

SUPPORTING FACTS:

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I WOULD LIKE A FULL & INVESTIGATION DONE ON THIS MATTER, I WOULD  
LIKE A FULL REFORMATION ON EVERYONE INVOLVED, ALSO IF DEFENDANT  
ARE FOUND WRONG, COMPENSATION IN MY BEHALF FOR PAIN & SUFFERING

L. D. B R O C K 2 3 5 5 5 2

Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on MARCH, 9, 2006  
(Date)

L. D. B R O C K 2 3 5 5 5 2

Signature of plaintiff(s)

[VI] GROUND ONE: CAUSED BODY HARM, BY OVER ABUSING THERE  
POWER (Cont)

FACE UP BAD HE WAS BLEEDING ALL OVER THE PLACE HE HAD  
SEVERAL CUTS. L.D. BROCK IS A MENTAL PATIENT HERE HE HAS  
TO SEE DR. BRUN. PETITIONER HAS SERIOUS MENTAL DISABILITIES

[VII] GROUND II TWO: DISCRIMINATING AGAINST ME, IN A IMPROPER  
MANNER FOR CORRECTIONAL OFFICERS. (Cont)

BUT THEY ALL DISCRIMINATE BECAUSE THEY DON'T LIKE YOU  
BECAUSE OF YOUR CHARGE YOU CATCH IT, IF THEY DON'T LIKE  
YOU COLOR YOU'VE HAD IT, THEY BACK EACH OTHER UP TO  
KEEP THEIRSELVES HALF WAY IN BOUNDS.

AT Approximately 9:00 AM FEB. 21, 2006 THE HOT DORM WAS escorted to the chow hall by OFFICER BAILEY. THE DIABETICS WERE CALLED IN FIRST AND THEN BAILEY spotted LD Brock AND BEGAN CUSSING HIM AND HANDED BROCK A DOUBLE EDGE RAZOR WITH NO STAFF AND TOLD BROCK TO SHAVE OR HE WOULD BE WRITTEN UP. LD Brock WAS MADE TO STAND IN FRONT OF THE ENTIRE DORM AND SHAVE WITH A NAKED RAZOR WHILE OFFICER BAILEY CALLED HIM "A STUPID SON OF A BITCH," OVER AND OVER.

LD Brock cut his self NUMEROUS TIMES TRYING TO SHAVE WHILE VISIBLY SHAKING. Brock entered the chow hall LAST WITH SEVERAL OPEN WOUNDS Bleeding AND A CUT ON HIS NECK. Brock is A MENTAL PATIENT WITH SERIOUS MENTAL DISABILITIES that everyone in THE PRISON KNOWS ABOUT.

UPON RETURNING TO THE DORM LD BROCK TRIED TO GO TO HCU AND/OR TRIED TO SEE THE SHIFT COMMANDER BUT WAS REFUSED BY OFFICER KEETON. OFFICER KEETON TOLD SEVERAL INMATES INCLUDING BROCK THAT BAILEY HAD TOLD HIM THAT [NOONE] WAS TO GO TO THE SHIFT OFFICE WITHOUT GOING THROUGH BAILEY HIMSELF. LD Brock WAS REFUSED TREATMENT FOR HIS INJURIES OF WHICH HE HAD ALSO CUT HIS FINGERS ON HIS HAND WHILE TRYING TO HOLD THE RAZOR TO SHAVE WITH. LD BROCK WAS AGAIN TRYING TO GET OFFICER KEETON TO LET HIM GO TO SEE THE DR. BRUN HIS DOCTOR WHO HAS BEEN TREATING BROCK BUT OFFICER KEETON REFUSED SLAMMING THE CUBICLE TRAY IN BROCK'S FACE.

HERE ARE A LIST OF ONLY A FEW INMATES THAT WITNESSED THE INCIDENT:

- |                                |                                |
|--------------------------------|--------------------------------|
| 1 <u>Phil Crosby #221450</u>   | 6 <u>Ret Haulley 133711</u>    |
| 2 <u>Victor Harris #181938</u> | 7 <u>Richard Moulton</u>       |
| 3 <u>Cory Hodge #198570</u>    | 8 <u>Jason Channell 164952</u> |
| 4 <u>Gene Smith #129020</u>    | 9 _____                        |
| 5 <u>Joe Luby #135327</u>      | 10 _____                       |